



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

CK/LXN  
F.#2010R01079

*271 Cadman Plaza East  
Brooklyn, New York 11201*

February 22, 2012

By Federal Express & ECF

Joel S. Cohen, Esq.  
128 Mott Street, Ste 706  
New York, New York 10013

Re: United States v. Chang  
Criminal Docket No. 11-0067 (S-2) (SJ)

Dear Mr. Cohen:

Enclosed please find one CD containing the government's continued discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government hereby also requests reciprocal discovery.

The materials include:

- (a) Travel and expense reimbursements submitted to St. John's University (115491-119683);
- (b) Documents relating to a Morgan Stanley check (124736-124739);
- (c) Documents that appear to be original Taishin Bank statements which were found in the defendant's office at St. John's University and documents that purport to be Taishin Bank statements for the same time period which were submitted to St. John's University for reimbursement (127819-128730). The documents are organized by date. Many of these documents have been previously produced. As a courtesy, the government will also produce these documents in binders in a later production.

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If you have any questions or further requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney  
Eastern District of New York

By: /s/  
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Lan Nguyen  
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Enclosures

CC: Clerk of Court (SJ) (w/o enclosures)